

## REMARKS

The Examiner's Action mailed on September 2, 2003 has been received and its contents carefully considered.

In this Amendment, Applicants have amended claim 1, and added claims 24-35. Claims 1, 8, 12 and 25 are the independent claims. Claims 1-15 and 21-35 are pending in the application. For at least the following reasons, it is submitted that this application is in condition for allowance.

It is noted that this Amendment necessitates an excess claim fee of \$86.00 for one extra independent claim in excess of three, and of \$180.00 for ten claims in excess of twenty. A check for these fees is attached. Should the check be missing, or should other fees be required, please charge our Deposit Account No. 18-0002 and advise us accordingly.

Initially, Applicants would like to take this opportunity to thank the Examiner for allowing claims 8-15. However, for at least the following reasons, it is submitted that claims 1-7 and 21-35 are likewise patentably distinguishable over the cited reference.

The Examiner has rejected claims 1-7 and 21-23 as being anticipated by *Lin et al.* (USP 6,359,340). It is submitted that these claims are patentably distinguishable over this reference for at least the following reasons.

Applicants' independent claim 1 is directed to a re-arrangement sheet adapted to be mounted on a top surface of an element. The re-arrangement sheet includes an insulating sheet having a smaller size in area than the top surface of the element. The insulating sheet has an element mounting region defined thereon. The re-arrangement sheet further includes a plurality of conductive metallic patterns formed on the insulating

sheet so as to surround, but not extend into, the element mounting region. Each of the conductive metallic patterns extends continuously, and in a straight line. This claimed configuration allows for an increase in the design freedom in configuring a semiconductor device that utilizes Applicants' claimed re-arrangement sheet, as discussed in Applicants' specification on page 5, line 26 through page 6, line 9. This claimed configuration is not disclosed (nor suggested) by the cited reference.

*Lin et al.* disclose a multi-chip module that includes a substrate 560. Substrate 560 has traces 560a thereon. Chips 510, 520, 540 are disposed on the substrate 560, and are connected to the traces 560a using wires 522.

Initially, it appears as if the Examiner is combining features from different embodiments in support of the rejections, i.e., see the rejection against claim 6, which relies on the teachings from the first embodiment, whereas the rejection against claim 1 relies on the teachings of the fifth embodiment. While this may be a proper course of action when rejecting the claims under 35 USC Section 103, the Examiner is reminded that the rejection at hand is based on 35 USC Section 102. Such combining of embodiments is improper in establishing a *prima facie* case of anticipation.

The Examiner's Action appears to be equating the substrate 560 as being a rearrangement sheet, and the traces 560a as being conductive metallic patterns. However, each of these traces does not extend in a straight line, as recited by claim 1. Instead, each of these traces has a square configuration, rather than a line shape as required by claim 1.

Moreover, there is no disclosure from this reference that the substrate 560 is adapted to be mounted on a top surface of an element, and with the re-arrangement

sheet including an insulating sheet having a smaller size in area than the top surface of the element, as recited in claim 1. As such, it is submitted that claim 1, and the claims dependent therefrom, are *prima facie* patentably distinguishable over the cited reference. It is thus requested that this claim, and the claims dependent therefrom, be allowed, and it is further requested that this rejection be withdrawn.

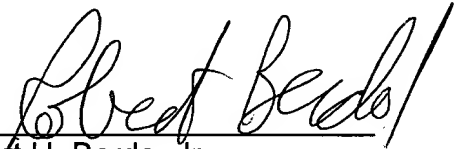
Moreover, dependent claim 7 is submitted to be further patentably distinguishable over the cited reference for at least the following additional reasons. Claim 7 recites that the insulating sheet is an insulating adhesive sheet. The Action refers to column 6, lines 5-11 of the reference in support of this part of the rejection. However, initially it is noted that this portion of the patent refers to the fourth embodiment, and only discloses various materials that the substrate can be comprised of. However, to the best of the undersigned counsel's knowledge, these given materials are not insulating adhesives, as would be required by claim 7. That is, the reference teaches that the chip 510 is attached to the substrate 530 using a separate adhesive (not shown). Thus, if the substrate were an adhesive sheet, as proposed by the Action, then a separate adhesive should not be required to attach the chip 510 to the substrate 530. It is thus requested that this claim be allowed.

It is submitted that this application is in condition for allowance. Such action and the passing of this case to issue are requested.

Should the Examiner feel that a conference would help to expedite the prosecution of the application, the Examiner is hereby invited to contact the undersigned counsel to arrange for such an interview.

Respectfully submitted,

December 1, 2003  
Date

  
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Robert H. Berdo, Jr.  
Registration No. 38,075  
RABIN & BERDO, PC  
Customer No. 23995  
Telephone: 202-371-8976  
Facsimile: 202-408-0924

RHB:rhb